

1 J. MICHAEL KALER, SBN 158296  
2 KALER LAW OFFICES  
3 9930 Mesa Rim Road, Suite 200  
4 San Diego, California 92121  
5 Telephone (858) 362-3151  
6 [michael@kalerlaw.com](mailto:michael@kalerlaw.com)  
7  
8 MELODY A. KRAMER, SBN 169984  
9 KRAMER LAW OFFICE, INC.  
10 9930 Mesa Rim Road, Suite 1600  
11 San Diego, California 92121  
12 Telephone (858) 362-3150  
13 [mak@kramerlawip.com](mailto:mak@kramerlawip.com)

15 Attorneys for Plaintiff JENS ERIK  
16 SORENSEN, as Trustee of SORENSEN  
17 RESEARCH AND DEVELOPMENT TRUST

Thomas W. Ferrell  
[tferrell@higglaw.com](mailto:tferrell@higglaw.com)  
Charles F. Reidelbach, Jr.  
[reidelbach@higglaw.com](mailto:reidelbach@higglaw.com)  
HIGGS FLETCHER & MACK, LLP  
401 West A Street  
Suite 2600  
San Diego, California 92101  
Telephone: (619) 236-1551  
Facsimile: (619) 696-1410

Mark G. Kachigian  
[mkachigian@hjklaw.com](mailto:mkachigian@hjklaw.com)  
Cassandra L. Wilkinson  
[cwilkinson@hjklaw.com](mailto:cwilkinson@hjklaw.com)  
HEAD, JOHNSON & KACHIGIAN, P.C.  
228 West 17<sup>th</sup> Place  
Tulsa, Oklahoma 74119  
Telephone: (918) 587-2000  
Facsimile: (918) 584-1718

Counsel for Defendants Global Machinery Company, GMCA Pty. Ltd., and Trapone Corporation Pty. Ltd.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

29     **JENS ERIK SORENSEN, as Trustee of**  
30     **SORENSEN RESEARCH AND**  
31     **DEVELOPMENT TRUST,**

) Case No. 08 CV 0233

**STIPULATED WITHDRAWAL  
OF REQUEST FOR ENTRY OF  
DEFAULT AND OF MOTION  
FOR EXTENSION OF ANSWER  
DATE**

34 Plaintiff.

FOR I

36 v.

11

**GLOBAL MACHINERY COMPANY**  
an Australian company: GMCA PTY.

1

40 LTD., an Australian company;  
41 TRAPONE CORPORATION PTY.  
42 LTD., an Australian company; and DOES  
43 1-100,

10

**45** **Defendants**

10

1 Plaintiff Jens Erik Sorensen, as Trustee of Sorensen Research and Development Trust  
 2 ("Plaintiff") and Defendants Global Machinery Company, GMCA Pty. Ltd., and Trapone  
 3 Corporation Pty. Ltd. ("Defendants") hereby stipulate to the withdrawal of Plaintiff's Request for  
 4 Entry of Default Pursuant to Fed.R.Civ.P. Rule 55(a) Against All Defendants, filed April 3, 2008  
 5 (Docket # 18), and of Defendants' Notice of Motion and Motion for Extension of Answer Date,  
 6 filed March 18, 2008 (Docket #s 7 and 10). Plaintiff and Defendants further stipulate that  
 7 Defendants will file an Answer by April 11, 2008.

8 Date: April 8, 2008

9 Respectfully submitted,

10 /s/ Michael Kaler

---

/s/Cassandra L. Wilkinson

---

11 J. MICHAEL KALER, SBN 158296  
 12 KALER LAW OFFICES  
 13 9930 Mesa Rim Road, Suite 200  
 14 San Diego, California 92121  
 15 Telephone (858) 362-3151  
 16 [michael@kalerlaw.com](mailto:michael@kalerlaw.com)

17 MELODY A. KRAMER, SBN 169984  
 18 KRAMER LAW OFFICE, INC.  
 19 9930 Mesa Rim Road, Suite 1600  
 20 San Diego, California 92121  
 21 Telephone (858) 362-3150  
 22 [mak@kramerlawip.com](mailto:mak@kramerlawip.com)

23 Attorneys for Plaintiff JENS ERIK  
 24 SORENSEN, as Trustee of SORENSEN  
 25 RESEARCH AND DEVELOPMENT TRUST

26 Thomas W. Ferrell  
[tferrell@higslaw.com](mailto:tferrell@higslaw.com)  
 27 Charles F. Reidelbach, Jr.  
[reidelbach@higslaw.com](mailto:reidelbach@higslaw.com)  
 28 HIGGS FLETCHER & MACK, LLP  
 29 401 West A Street  
 30 Suite 2600  
 31 San Diego, California 92101  
 32 Telephone: (619) 236-1551  
 33 Facsimile: (619) 696-1410

34 Mark G. Kachigian  
[mkachigian@hjklaw.com](mailto:mkachigian@hjklaw.com)  
 35 Cassandra L. Wilkinson  
[cwilkinson@hjklaw.com](mailto:cwilkinson@hjklaw.com)  
 36 HEAD, JOHNSON & KACHIGIAN, P.C.  
 37 228 West 17<sup>th</sup> Place  
 Tulsa, Oklahoma 74119  
 Telephone: (918) 587-2000  
 Facsimile: (918) 584-1718

Counsel for Defendants Global Machinery  
 Company, GMCA Pty. Ltd., and Trapone  
 Corporation Pty. Ltd.